

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

JEREMY NOYES

)
)
) Criminal No. 08-55 Erie
) (18 U.S.C. §§1462, 2252(a)(1),
) 2252(b)(1), 2252(a)(2),
) 2252(b)(2) and 2252(a)(4)(B))

I N D I C T M E N T

The grand jury charges:

From in and around June 2008, to in and around July 2008, in the Western District of Pennsylvania and elsewhere, the defendant, JEREMY NOYES, did knowingly transport and ship and attempt to transport and ship, in interstate and foreign commerce, specifically, by computer, visual depictions of minors, the production of which involved the use of a minor engaging in sexually explicit conduct, and which depict a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256.

In violation of Title 18, United States Code, Sections 2252(a)(1) and 2252(b)(1).

FILED

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COUNT TWO

The grand jury further charges:

From in and around December 2004, to in and around July 2008, in the Western District of Pennsylvania, the defendant, JEREMY NOYES, did knowingly receive, distribute, attempt to receive and attempt to distribute any visual depictions of a minor, that had been shipped and transported in interstate commerce, specifically, by computer, the production of which involved the use of a minor engaging in sexually explicit conduct, and which depict a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256.

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT THREE

The grand jury further charges:

From in and around December 2004, to in and around August 2008, in the Western District of Pennsylvania, the defendant, JEREMY NOYES, did knowingly possess and attempt to possess visual depictions, namely, visual images in individual computer files, the production of which involved the use of minors engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and which depict minors engaging in sexually explicit conduct, all of which had been shipped and transported in interstate and foreign commerce, by means of a computer.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

COUNT FOUR

The grand jury further charges:

From in and around June 2008, to in and around July 2008, in the Western District of Pennsylvania, the defendant, JEREMY NOYES, knowingly used an interactive computer service, as that term is described in Title 47, United States Code, Section 230(f)(2), for carriage in interstate and foreign commerce of an obscene matter, to wit, animated computer images, depicting minors engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 1462.

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts One, Two, Three and Four of this Indictment are incorporated herein by reference as though fully set forth herein for the purpose of alleging criminal forfeitures pursuant to Title 18, United States Code, Section 2253(a)(3).

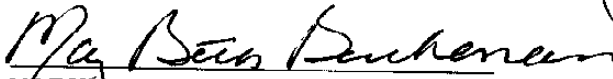
2. As a result of the commission of the violations charged in Counts One, Two, Three and Four of this Indictment, the defendant, JEREMY NOYES, did use the following to commit or to promote the commission of said violations (hereinafter collectively referred to as the "Subject Computers"):

Dell Inspiron B130 laptop computer
(serial number 5BNK7B1)

Medion Wim2000 laptop computer
(serial number 914T01M9132500193K000)

A True Bill,


FOREPERSON


MARY BETH BUCHANAN
United States Attorney
PA ID No. 50254